

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
LITIGATION

THIS DOCUMENT RELATES TO:
ALL CASES

) Civil Action No. 04-10294-DPW
) (Lead Case)
)
)
) **LEAD PLAINTIFF'S UNOPPOSED**
) **APPLICATION FOR LEAVE TO FILE A**
) **SINGLE OVERSIZED MEMORANDUM**
) **OF LAW IN OPPOSITION TO**
) **DEFENDANTS' MOTIONS TO DISMISS**
)
)

Pursuant to the Court's February 16, 2005 Order, Lead Plaintiff's opposition to defendants' motions to dismiss will be filed March 22, 2005. Three (3) motions to dismiss were submitted, by defendants Sonus Networks, Inc., Hassan M. Ahmed, and Stephen J. Nill. While Lead Plaintiff could, pursuant to LR 7.1(b), file separate memoranda in opposition to these motions not to exceed twenty (20) pages each, Lead Plaintiff believes that a single memorandum of law opposing each of the motions would be of benefit to the Court and parties, as there is overlap among the legal issues raised in the motions to dismiss.

Accordingly, pursuant to LR 7.1(b)(4), Lead Plaintiff hereby requests leave of Court to file a single memorandum of law in opposition to defendants' motions to dismiss not to exceed forty-five (45) pages. Defendants have advised Lead Plaintiff's counsel that they do not oppose this request.

Defendants have also requested that Lead Plaintiff advise the Court that defendants anticipate filing their own reply briefs in support of their respective motions to dismiss pursuant to the schedule previously ordered.

Dated: March 17, 2005

GOLD BENNETT CERA & SIDENER LLP

By /s/ Solomon B. Cera

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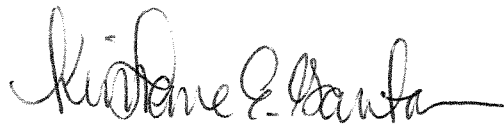
CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby declare under penalty of perjury as follows:

I am employed by Gold Bennett Cera & Sidener LLP, 595 Market Street, Suite 2300, San Francisco, California, 94105-2835. I am over the age of eighteen years and am not a party to this action.

On March 17, 2005, a true and correct copy of the aforementioned **“LEAD PLAINTIFF’S UNOPPOSED APPLICATION FOR LEAVE TO FILE A SINGLE OVERSIZED MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS’ MOTIONS TO DISMISS”** was delivered to all counsel of record by electronic service pursuant to the Court’s Order Regarding Electronic Service and served to counsel not on the Court’s electronic service by causing true and correct copies of same to be enclosed in sealed envelopes and deposited in the U.S. Mail, postage prepaid, or delivered as otherwise indicated via courier or facsimile, as indicated on the attached Exhibit I.

Executed on March 17, 2005, at San Francisco, California.

A handwritten signature in cursive script, reading "KimLane E. Gantan", written in black ink.

KimLane E. Gantan

EXHIBIT I

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